

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MATTHEW C. ZORN,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*,

Defendants.

Civil Action No. 4:22-CV-02396

JOINT PROPOSED SCHEDULE AND STIPULATION

In accordance with the Court's March 8, 2024 Order, the parties hereby propose a schedule for resolving this case. As the Court is aware, there are two claims remaining in this litigation—counts one and two in Plaintiff's Fourth Amended Complaint. The parties believe that the remaining claims present legal questions that will be resolved on summary judgment. The parties agree that an answer would not likely assist in resolving this matter and therefore they stipulate to dispense with the requirement for Defendants to file an answer here. The parties further propose the following schedule for summary judgment briefing as to the remaining claims:

Deadline for Plaintiff to file a motion
for summary judgment

September 30, 2024

Deadline for Defendants to file a
combined opposition to Plaintiff's
motion and a cross-motion for
summary judgment

October 30, 2024

Deadline for Plaintiff to file a combined
opposition to Defendants' cross-
motion and reply in support of
Plaintiff's motion

November 20, 2024

Deadline for Defendants to file a reply
in support of Defendants' cross-
motion

December 16, 2024

The parties believe that the foregoing proposed schedule will lead to the efficient resolution of this matter.

DATED: August 30, 2024

Respectfully Submitted,

s/Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney
Southern District of Texas
Attorney in Charge
Texas Bar No. 24037378
Federal ID No. 572175
1000 Louisiana, Suite 2300
Houston, Texas 77002
Tel: (713) 567-9532
Fax: (713) 718-3303
jimmy.rodriguez2@usdoj.gov

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Branch Director

s/Joshua Kolsky
Joshua M. Kolsky
Senior Trial Counsel
Civil Division, Federal Programs Branch
U.S. Department of Justice
Texas Bar No. 24092989
1100 L Street, NW
Washington, DC 20005
Tel: (202) 305-7664
joshua.kolsky@usdoj.gov

Attorneys for Defendants

/s/ Matthew Zorn
Matthew C. Zorn
Yetter Coleman LLP
mzorn@yettercoleman.com
811 Main Street, Suite 4100
Houston, TX 77002
T: (713) 632-8000
F: (713) 632-8002

Shane Pennington
Vicente Sederberg LLP
1115 Broadway, 12th Floor
New York, NY 10010
T: (917) 338-5455
F: (303) 860-4505
s.pennington@vicentesederberg.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on August 30, 2024, a true and correct copy of the foregoing was filed with the United States District Clerk for the Southern District of Texas and electronically served on all counsel of record via the District's ECF system.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney